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CHUNGHWA PICTURE TUBES, LTD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to:

ALL ACTIONS

CASE NO. 3:07-CV-5944 SC

MDL NO. 1917

**DECLARATION OF JORDAN HELLER
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
CONFIDENTIAL DOCUMENTS UNDER
SEAL**

I, Jordan Heller, hereby declare as follows:

1. I am an attorney duly admitted to practice in the State of California. I am an associate at the law firm of Gibson, Dunn & Crutcher LLP, counsel for defendant Chunghwa Picture Tubes, Ltd. ("Chunghwa"), in the above-entitled matter. I have personal knowledge of the matters stated herein, and if called as a witness, I could and would testify competently to them. This declaration is submitted in support of Defendants Panasonic Corporation of North America, Panasonic Corporation, and MT Picture Display Co., Ltd.'s ("Panasonic Defendants") Administrative Motion to File Confidential Documents Under Seal pursuant to Civil Local Rules 7-11 and 79-5(d) (Dkt. No. 889).
2. The following Chunghwa documents were attached to the Declaration of Jeffrey Kessler in Support of Defendants' Motion for Sanctions Pursuant to Rule 11 ("Kessler Declaration") (Dkt. No. 889):

- 1 • Chunghwa document CHU00029238-40, report and analysis of meeting of April 14,
- 2 1999, as well as Chunghwa's English translation, attached thereto as Exhibit G;
- 3 • Chunghwa document CHU00030787-94, report and analysis of meeting of June 23,
- 4 1999, as well as Chunghwa's English translation, attached thereto as Exhibit H;
- 5 • Chunghwa document CHU00028933-45, report and analysis of meeting of May 29,
- 6 1995, as well as Chunghwa's English translation, attached thereto as Exhibit I;
- 7 • Chunghwa document CHU00028909-11, report and analysis of meeting of October
- 8 24, 1996, as well as Chunghwa's English translation, attached thereto as Exhibit J;
- 9 • Chunghwa document CHU00028749-51, report and analysis of meeting of March 19,
- 10 1997, as well as Chunghwa's English translation, attached thereto as Exhibit K;
- 11 • Chunghwa document CHU00031013-14, report and analysis of meeting of June 28,
- 12 2000, as well as Chunghwa's English translation, attached thereto as Exhibit L;
- 13 • Chunghwa document CHU00031051-55, report and analysis of meeting of September
- 14 21, 2000, as well as Chunghwa's English translation, attached thereto as Exhibit M;
- 15 • Chunghwa document CHU00031183-85, report and analysis of meeting of February
- 16 22, 2002, as well as Chunghwa's English translation, attached thereto as Exhibit N;
- 17 • Chunghwa document CHU00031240-47, report and analysis of meeting of March 25-
- 18 27, as well as Chunghwa's English translation, attached thereto as Exhibit O;
- 19 • Chunghwa document CHU00031254, report and analysis of meeting of July 2, 2004,
- 20 as well as Chunghwa's English translation, attached thereto as Exhibit P.

21 3. The documents attached to the Kessler Declaration as Exhibits G through P, inclusive,
 22 are designated by Chunghwa as "Confidential" pursuant to the Stipulated Protective Order entered in
 23 this case (Dkt. No. 306).

24 4. Exhibits A and C of the Kessler Declaration contain excerpts and detailed summaries
 25 of Chunghwa documents at the following locations, listed by page and line number:


- 26 • Exhibit A: 41:17-24; 42:2-21; 43:1-22, 24-26; 44:1-15, 17-21, 23-28; 45:1-3, 5-20, 23-
- 27 25; 46:1-3, 8-9, 11-13, 25-28; 47:1-8, 15-22, 24-28; 48:1-5, 8-11, 14-24, 25-28; 49:1-
- 28 3, 5-10, 12-14, 17-28; 50:1-5, 9-11, 15-16, 18-23; 51:2-5, 7-9.

- Exhibit C: 41:20-16; 42:2-21; 43:1-22, 24-26; 44:1-15, 17-21, 23-27; 45:1-3, 5-17, 21-23; 46:1-3, 8-9, 11-13, 20-23, 26-27; 47:1-10, 18-25; 48:1-10, 14-17, 20-28; 49:1-3, 4-18, 20-22, 25-27; 50:1-13, 17-20, 23-25, 26-27; 51:1-3, 10-14, 16-17.
- Exhibit E: 8:8-16, 18-26; 9:3-6, 8-14, 16-18, 20-26; 10:1-12, 16-19, 22-24, 25-27; 11:1-2, 9-12, 16-18, 21-24; 12:1-6, 9-12, 14-22, 24-27; 13:1-2, 4-8; 14: 4-7, 11-15, 20-23; 16:16-21; 18:4-7; 22:12-20, 22-28; 23:1-3, 6-9, 11-16, 18-20, 22-27; 24:1-14, 18-21, 25-27; 25:1-6, 13-15, 19-21, 24-27; 26:3-9, 12-15, 17-24, 27-28; 27:1-4; 7-11.
- Exhibit F: 8:3-11, 13-22, 26-28; 9:1, 3-10, 12-14, 16-27; 10:1-7, 11-14, 18-20, 21-25; 11:5-8, 12-14, 18-21, 26-28; 12:1-4, 8-11, 14-21, 24-28; 13:1, 4-8; 14:5-8, 12-16, 21-24; 16:17-22; 18:4-7; 21:25-28; 22:1-6, 7-16, 20-22, 24-28; 23:1-3, 5-7, 9-27; 24: 4-7, 11-13, 14-19, 26-27; 25:1-2, 5-7, 17-22, 26-27; 26:1-2, 4-12, 14-19, 21-25.

5. The Chunghwa documents excerpted and summarized in Exhibits A, C, E, and F of the Kessler Declaration at the page and line numbers identified herein were designated by Chunghwa as "Confidential" pursuant to the Stipulated Protective Order entered in this case (Dkt. No. 306).

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing statements are true and correct.

Executed this 14th day of April 2011, at San Francisco, California.

By:  _____
Jordan Heller

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